

From: [Hollatz, Peter](#)
To: [Knoepfle, Jennifer](#); john.wolski@rtx.com; [Alberg, Jon](#)
Cc: [Rodibaugh, Kelly](#)
Subject: RE: SERGS SA9/10 QAPP Nov2021 comments
Date: Sunday, December 5, 2021 8:23:04 PM

Hi Jennifer,

The revised documents have been sent to you via WeTransfer. Please see the green highlighted text below.

Thanks

Peter

Peter Hollatz, PE
Engineer
O 919 461 1194
C 630 918 9648

peter.hollatz@aecom.com

AECOM

5438 Wade Park Boulevard Suite 200, Raleigh, NC 27607
www.aecom.com

From: Knoepfle, Jennifer <Knoepfle.Jennifer@epa.gov>
Sent: Tuesday, November 30, 2021 3:31 PM
To: john.wolski@rtx.com; Hollatz, Peter <Peter.Hollatz@aecom.com>; Alberg, Jon <Jon.Alberg@aecom.com>
Cc: Rodibaugh, Kelly <Rodibaugh.Kelly@epa.gov>
Subject: [EXTERNAL] SERGS SA9/10 QAPP Nov2021 comments
Importance: High

Hi John

EPA has reviewed the November 19, 2021 submittal of the Quality Assurance Project Plan (QAPP) for Southeast Rockford Groundwater Contamination Superfund Site Source Area 9/10. In order to expedite the finalization and approval of this document I am presenting in email format two major comments that must be remedied for approval as they are a requirement under EPA's QAPP guidance for Region 5 (https://www.epa.gov/sites/default/files/2016-06/documents/r5-final_0.pdf). I also list two other minor comments which should be clarified or fixed as applicable.

Please feel free to call me and or schedule a meeting with myself and Kelly Rodibaugh if you find that would be preferable. At this point, EPA would need HSC/AECOM to address the comments and submit a revised QAPP with the updates and modifications prior to approval. We also ask that a clean pdf of the QAPP be part of the resubmittal, the last submission only included a redline text word document for the QAPP worksheets, which along with the pdf makes checking the changes

against the clean copy possible.

Comments are in highlighted yellow; my editorial attempt at clarifications are in italics.

Major Comments

QAPP Worksheet #3 & #5: Project Organization and QAPP Distribution

The organizational chart is still not included in the November 19, 2021 QAPP and is a requirement.

AECOM: Updated QAPP Worksheet #3 & #5.

Please provide an org chart it's a requirement per the guidance.

-

QAPP Worksheet #31: Planned Project Assessments Table, Worksheet #32: Assessment Findings and Corrective Response Actions, Worksheet #33 Quality Assurance Management Reports Table

The updated (11/19/21) table does not include any assessments by AECOM of the type described in the EPA QA/R-5 QAPP requirements. **AECOM: Updated Worksheet #31 and #32**

We see that AECOM listed a technical system audits to be conducted by the laboratory, health and safety audit to be performed by AECOM, and a potential EPA audit for confirmation monitoring. However, it seems that AECOM's quality team would perform sampling and field related assessments as part of their QA system and Worksheet #31 is the place to describe these assessments. This would include things like field readiness reviews, desktop or field audits, desktop reviews and checklists, recurring meetings between quality manager and field team leader, etc. These are defined assessments performed by the quality team and the function is to confirm that the QAPP is being implemented appropriately. Furthermore, this also includes documenting in Worksheet #32 how corrective actions or findings resulting from these types of assessments identified in Worksheet #31, would be addressed. In other words, how are nonconformances to the QAPP identified and resolved? If AECOM doesn't have a QA system – this should be something we discuss on how to proceed.

Minor Comments

QAPP Worksheet #12: Measurement Performance Criteria Table

If Sulfite is an analyte included in this project, include Sulfite in Worksheet #12 **AECOM: Updated to remove sulfite. Should be sulfide for monitored natural attenuation.**

It is unclear if there is a spelling error between sulfite and sulfide in parts of the document. Sulfite is referenced as an analyte in Worksheets #17, #19 & 30, #23, and #24. If sulfite is being sampled for then it should be included in Table 12-A in Worksheet #12 with all the other analytes. If sulfite is NOT being sampled for, then it should be removed from Worksheets #17, #19 & 30, #23, and #24. If it is a spelling mistake, please remedy.

!

SOPs:

- SOP F110 is still included twice in Appendix B, on p. 172 and again on p. 216. **AECOM: Removed the redundant entry in Appendix A.**

Best,
Jennifer

Jennifer Knoepfle, Ph.D., P.G.
Remedial Project Manager

U.S. EPA Region 5

77 W. Jackson Blvd. (SR-6J)

Chicago, IL 60604

312-886-7153 (o), 312-636-7850 (c)